

Contracting for Units



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Contracting for Units



- Rent Reasonableness Survey
- Environmental Review Clearance
- Lead-Based Paint documentation
- Housing Quality Standards (HQS)

IF we have time, we will also detail how to become taller, richer, and have a 52” vertical leap.

A Quick Note: Grantee Only Pages



We want to make sure that the grantee only pages for each program have the forms and information you need.

- ❑ If ANYTHING is confusing, please let us know!
- ❑ If more specialized trainings would help on forms, please let us know!

Contracting for Units:

Rent Reasonableness Survey

§ 578.51 Rental assistance.

(g) Rent reasonableness. **HUD will only provide rental assistance for a unit if the rent is reasonable.** The recipient or sub-recipient must determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. **Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units.**

□ Case of the Wheeler Dealer...

Probably Not Falling Under A Reasonable Rent



Contracting for Units: Rent Reasonableness

- ❑ For S+C grants, the subrecipient must complete the Rent Reasonableness Checklist and Certification Forms (RRS)
- ❑ This RRS should be kept on-site by the sponsor agency and presented during annual monitoring
- ❑ RRS should be completed for all initial units and when a rent increase occurs

RRS is on the Grantees Only Page for S+C

http://www.dca.ga.gov/housing/specialneeds/programs/ShelterPlusCare_GranteesOnly.asp

Contracting for Units: Environmental Review

§ 578.31 Environmental review.

- ❑ (a) Activities under this part are subject to environmental review by HUD under 24 CFR part 50. The recipient or subrecipient shall supply all available, relevant information necessary for HUD to perform, for each property, any environmental review required by 24 CFR part 50. The recipient or subrecipient must carry out mitigating measures required by HUD or select an alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement.
- ❑ (b) The recipient or subrecipient, its project partners, and their contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this part, or commit or expend HUD or local funds for such eligible activities under this part, until HUD has performed an environmental review under 24 CFR part 50 and the recipient or subrecipient has received HUD approval of the property.

True or False?

Q: The property IS in a flood plain, but the unit is on the third floor. We're OK to place them, right? I mean, how high can the water really get? (Real Question!)

Q: DCA did an environmental for the unit next door at the same complex. We don't need to do another environmental, right?

Q: We can just place people before submitting an environmental, right?

Q: The tenant is ok with the toxic landfill, and still wants the unit. The client can consent, right?

Q: I can just send these to my favorite program staff at DCA, right?

Q: I heard that my type of housing is Excluded or Exempt from certain environmental review activities. I don't have to do anything, right?

Q: Management swears that the reactor leak was cleaned up already, and they'll put it in writing, that's good enough, right?



As just discussed, the answer to all of those questions is

FALSE!

Contracting for Units: Environmental Review

Different Programs – Different Requirements

- ☐ Tenant Based Rental Assistance
- ☐ Rapid Rehousing
- ☐ Shelter Plus Care
- ☐ Sponsor Based Rental Assistance
- ☐ Project Based Rental Assistance

Rule of Thumb: If tenant can't choose housing location, stricter standard.

Contracting for Units: Environmental Review

S+C Environmental Information Form				
Sponsor:				
Subject Property:				
Street Address of Site or Multifamily Complex:		If Complex, Include Complex Name and All Unit Numbers:		
Please check the applicable spaces to assist us in preparing the Environmental Review Record for subject property.				
Are any of your organization's activities		Yes	No	Don't Know
1.	In an historic building, or in an historic district, or in a building that is over 50 years old?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	In a floodplain?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	In a Wetlands Protection District?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	In an area with excessive noise (located near a major road, highway or freeway - within 3000 feet of a railroad)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	In an area of poor air quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Near thermal or explosive hazards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Near a military (within 15 miles) or civilian (within 5 miles) airport?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Adjacent to a major waterway (state or federally designated wild and scenic river)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	Adjacent to a solid waste facility?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.	Within a Coastal Area Protection Zone?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	In an area with endangered wildlife (plant or animal)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.	Near a Sole Source Aquifer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13.	Located on property that has been used as farmland in the last three years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14.	In a historic preservation area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15.	In a local target area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.	In a Presidential declared major disaster area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17.	Using sites that will be converted from non-residential to residential use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18.	In a Brownfield redevelopment area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19.	Colonia (not applicable to Georgia)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20.	In a CDBG Strategy Area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21.	Are there any environmental issues concerning your shelter that are not addressed by any of the above environmental categories?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22.	Attach an area map (behind this page) with the physical location of subject property clearly identified (circled). The map should identify all major highways, interstates, rail roads, airports and bodies of water located near your organization.	<input type="checkbox"/> Attached		
23.	Include FEMA Floodplain map (FIRMette) (www.fema.gov/hazard/map/flood.shm) showing subject property. Circle the subject property and identify any encroaching floodplains.	<input type="checkbox"/> Attached		
Organization must explain any "Yes" answers here:				
I certify that the information on this form is true and complete:		Name, title, address, phone and email of person completing this form:		
Signature and Date Name and title:				

Contracting for Units: S+C Environmental Review

- ❑ Go to the S+C Grantees Only webpage
- ❑ Complete the S+C Environmental Information Form
- ❑ Follow the link to FEMA Floodplain Maps and complete the Sample Location and Floodplain Maps for your requested address as per the example
- ❑ Attach a prior environmental for the unit/complex if you have it. Send it to the address listed.
- ❑ Whole property clearance

http://www.dca.ga.gov/housing/specialneeds/programs/ShelterPlusCare_GranteesOnly.asp

Where's My Environmental?

Our goal is to return your environmental as quickly as possible. Always give as much lead time as possible, because sometimes the process can take time!

Case of the 1950's Dry Cleaners

Case of Prior Use – Detective Work

We serve you. Please reach out to us if you are not seeing your environmental returned timely!

David.Whisnant@DCA.GA.GOV

Contracting for Units: Lead-Based Paint



- ❑ Sponsors must document compliance with rules associated with Lead-Based Paint Hazards.
- ❑ This documentation must be maintained by the Sponsor and is subject to review by DCA or its representatives.
- ❑ Please check the Grantees Only Page for your program for further details.

Contracting for Units: Housing Quality Standards



“The HQS inspection serves the primary purpose of ensuring a basic level of acceptable housing to meet the health and safety needs of program participants. In addition, HQS inspection helps prevent the expenditure of federal funds on substandard dwelling units and increases the availability of suitable housing for lower income families.”

Contracting for Units:

Housing Quality Standards

§ 578.75 General operations.

- (b) Housing quality standards. Housing leased with Continuum of Care program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable housing quality standards (HQS) under 24 CFR 982.401 of this title, except that 24 CFR 982.401(j) applies only to housing occupied by program participants receiving tenant-based rental assistance. For housing rehabilitated with funds under this part, the lead-based paint requirements in 24 CFR part 35, subparts A, B, J, and R apply. For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. For residential property for which funds under this part are used for acquisition, leasing, services, or operating costs, 24 CFR part 35, subparts A, B, K, and R apply.
- (1) Before any assistance will be provided on behalf of a program participant, the recipient, or subrecipient, must physically inspect each unit to assure that the unit meets HQS. Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.
- (2) Recipients or subrecipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

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Contracting for Units: Housing Quality Standards

§ 578.75 General operations.

- ❑ (1) Before any assistance will be provided on behalf of a program participant, the recipient, or subrecipient, must physically inspect each unit to assure that the unit meets HQS.
- ❑ For all S+C units, DCA is the recipient. DCA must complete the official HQS inspection.

Contracting for Units: Housing Quality Standards

§ 578.75 General operations.

- Assistance will not be provided for units that fail to meet HQS, unless the owner corrects any deficiencies within 30 days from the date of the initial inspection and the recipient or subrecipient verifies that all deficiencies have been corrected.

Contracting for Units: Housing Quality Standards

§ 578.75 General operations.

- (2) Recipients or subrecipients must inspect all units at least annually during the grant period to ensure that the units continue to meet HQS.

Contracting for Units: Housing Quality Standards

Shelter Plus Care Program Housing Quality Standards Inspection			
This form must be completed before a HQS inspection will be conducted by DCA staff. DCA will not reimburse your agency for any expenses associated with the unit(s) listed below until DCA staff conducts HQS inspections and all deficiencies corrected. If you need assistance with completing this form, please contact Phillis Thomas at Phillis.Thomas@dca.ga.gov for guidance.			
Organization			
Contact Person		Telephone	
		Email:	
HUD Grant Number <small>(please refer to your HUD contract)</small>			
Complete Address for Unit(s) to be Inspected: (Name of Complex)		Number of units	
1.			
2.			
3.			
1. Do you have a copy of the Environmental Clearance certification from DCA for the above listed site? If Yes, you do not have to submit environmental form(s)/ map(s).		<input type="checkbox"/> Yes <input type="checkbox"/> No	
2. Environmental form completed/ FEMA map attached.		<input type="checkbox"/> Yes <input type="checkbox"/> No	
3. Are rents reasonable for units identified in the SPC program? Documentation on file.		<input type="checkbox"/> Yes <input type="checkbox"/> No	
4. Is this a Tax Credit Property? Do not use Tax Credit properties unless all lease arrangements are approved specifically by DCA.		<input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Sponsor is compliant with rules associated with Lead-Based Paint Hazards.		<input type="checkbox"/> Yes <input type="checkbox"/> No	
6. Utilities are connected for units to be inspected.		<input type="checkbox"/> Yes <input type="checkbox"/> No	
7. Pre-inspection completed by Sponsor for units listed below.		<input type="checkbox"/> Yes <input type="checkbox"/> No	
DCA will not reimburse your agency for any expenses associated with the unit(s) listed above until DCA staff conducts HQS inspections and all deficiencies corrected.			
I certify that to the best of my knowledge the above information including the attached environmental form is true.			
Sponsor, Authorized Signature _____		Date _____	
DCA, Authorized Signature _____		Date _____	

Contracting for Units: Housing Quality Standards



Common Failures

- ❑ Smoke detectors
- ❑ Water Heaters
- ❑ Utilities are not turned on for the inspection
- ❑ Handrails for steps, entrances, porches

Contracting for Units: Housing Quality Standards



Contracting for Units: Housing Quality Standards



Contracting for Units

- ❑ Complete the Rent Reasonableness Survey
- ❑ Complete the HQS Inspection Long Form (on the website). Make sure all repairs are made before official inspection request is submitted.
- ❑ Complete Lead Based Paint assessment and document compliance with rules associated with Lead Based Paint Hazards.

Contracting for Units

- ❑ Determine if Environmental Review (ER) is complete for this property.
 - ❖ If so, attach a copy of the ER with request.
 - ❖ If not, complete and attach Environmental Information Form, a sample location map clearly showing the proposed site, and FEMA Floodplain Maps.
- ❑ Complete the HQS Inspection Request Form.
- ❑ Email HQS Inspection Request Form, Environmental Information Form and Floodplain Map to:
Rick.Heermans@dca.ga.gov

